



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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May 2, 2008

Ref: 8EPR-N

Walter C. Waidelich, Division Administrator  
Federal Highway Administration  
2520 West 4700 South  
Suite 9A  
Salt Lake City, UT 84118

John Njord, Executive Director  
Utah Department of Transportation  
4105 South 2700 West  
Salt Lake City, UT 84119

Re: Comments on Layton Interchange Salt  
Lake County, Draft Environmental Impact  
Statement (DEIS): CEQ#: 20080129

Dear Messrs: Waidelich and Njord:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) 42 U.S.C. Section 4231 et. seq., and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Layton Interchange Draft Environmental Impact Statement (DEIS). The proposed action is located in Layton City, Utah, adjacent to the I-15 corridor. The purpose of the project is threefold: 1) to address current and projected traffic demand and operations for the South Layton Interchange (I-15 Exit 330), 2) to provide unrestricted access across the Union Pacific Railroad to the developing area of west Layton, 3) to provide adequate transportation facilities and traffic capacity west of I-15 to relieve existing and projected traffic congestion by providing as near to level-of service D as possible or better on Gentile Street. The action alternatives analyzed include No Action, the Transportation System Management/Transportation Demand Management Alternative (TSM/TDM), the Transit Alternative, the TSM/TDM /Transit Alternative, and the five build alternatives. These alternatives were further refined by analyzing their ability to meet the purpose and need of the project. This DEIS examines the two remaining alternatives; No Action and the preferred alternative, or Alternative 2.

EPA appreciates the opportunity to review this project. We also acknowledge the complexities in designing such an interchange in a manner that meets the purpose and need, considers and mitigates environmental impacts and attempts to meet the needs of the local

communities.

Pursuant to EPA policy and guidance, EPA rates the environmental impact of an action and the adequacy of the NEPA analysis. EPA has rated the action alternative (preferred alternative) as "LO" (Lack of Objection). This "LO" rating means the review has not identified any potential environmental impacts requiring substantive changes to the action alternatives. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the action alternatives. An explanation of the rating criteria is enclosed.

We have attached a list of concerns by resource area where clarifying language or information is suggested. We have appreciated the opportunity to participate in this project. If you have any questions or would like to discuss our comments, please contact me at (303) 312-6004. You may also contact Robin Coursen of my staff at (303)312-6695.

Sincerely,

/s/ Larry Svoboda  
Director, NEPA Program  
Office of Ecosystems Protection and Remediation

Enclosure

Cc: Greg Punske, FHWA (email) and signed copy  
Ed Woolford, FHWA (email)  
Carlos Machado, FHWA  
Jason Gipson, U.S. Army Corps of Engineer (email)



## EPA COMMENTS ON LAYTON INTERCHANGE DEIS

### General

The document only presents the impacts on environmental resources for the Preferred Alternative. In the described screening process, only two alternatives were analyzed for potential impacts to critical environmental resources. The only critical environmental resource identified was cultural resources protected by Section 4(f) of the Department of Transportation Act. No analysis was conducted to compare impacts to wetlands. Comparison of wetland impacts is needed in order to identify the Least Environmentally Damaging Preferred Alternative (LEDPA) under Section 404 (b) (1) of the Clean Water Act. Although the wetland impacts of this project are minimal and your agencies have consulted with the United States Army Corps of Engineers, EPA recommends inclusion of this information in the final EIS.

#### *Recommendation:*

Include wetland impact comparison of Alternatives 2G and 4B.

### Air Quality

- Page 3-66, Carbon Monoxide – Please correct the following formula ( $CO_8 = PF \times (CO_1 - BG_1) = BG_8$ ) to agree with the formula in Appendix B = should be +). Also, please explain how the 8-hour ambient background CO concentration was determined.
- Page 3-70 – For the purposes of public disclosure, EPA recommends the addition of a table to show which schools, hospitals, and residential areas are within ¼ mile of the new interchange and which would be of highest risk of exposure to Mobile Source Air Toxics.
- Page 3-72 – “What mitigation measures would be required ...” The statement “The Preferred Alternative would likely result in a minimal increase in air pollutant emissions” contradicts the decrease in emissions shown in Table 3-21 and Appendix B. Also, the first paragraph on page 3-92 states “With improvements to vehicle emissions and more stringent air quality controls, it is anticipated that air quality will continue to improve in Davis County through the 2030 planning period. EPA recommends that the above statement be revised to agree with the decrease in emissions shown in Table 3-21 and the statement on page 3-92.
- Page 3-92, Ozone – Please discuss both the new ozone National Air Quality Standard (now 75 ppb vs. 80 ppb, previously) and the possible increase in ozone due to increased non-road sources resulting from new residential development and growth occurring in this city and county. Non-road sources related to residences would be lawn mowers, paints, and consumer products which emit pollutants such as nitrogen oxides (NOx) and/or volatile organic compounds (VOCs.)



- Page 3-92, first paragraph – The last sentence “Air pollutant emissions as a result of the Preferred Alternative would increase slightly due to the increase in vehicle miles traveled because of improved mobility” appears to contradict the first sentence in the same paragraph: “...it is anticipated that air quality will continue to improve in Davis County ... .” Please clarify the apparent contradiction in these statements.
- Page 3-99, Air Quality Paragraph – Possibly “disturbed surface areas” would be more meaningful than “disrupted surface areas.”